

REMARKS

Claims 9 through 14 and 23 through 33 remain in this application. Claims 9 and 23 have been made independent.

The specification at page 6 was objected to because it contained an imbedded hyperlink. The specification has been amended to remove the hyperlink but retain the prior art references.

The specification at page 5 was objected to because of improper use of a trademark without generic terminology. The paragraph containing the lines 5, 15, 17 and 18 objected to has been amended to include the generic terminology without adding new matter.

Claims 5 and 19 are objected to for the same reason. Claims 5 and 19 have been canceled. Claim 31 has been amended to include the generic terminology.

It should be noted that at page 3 of the specification, applicants have identified the word Java as the trademark of Sun Microsystems Inc., and is using the word elsewhere in the specification in the same manner as is used by Sun Microsystems in their programming language.

Claims 5, 19 and 31 have also been rejected under 35 U.S.C. 112 on the ground that Java does not identify a particular material or product. Applicants respectfully traverse this rejection on the grounds that Java is a well known programming language that is used in Java type systems to create Java applications, Java virtual machine, Java based environment, and so forth, as set out in the claims of many issued patents. As of

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January 12, 2005, 981 U.S. Patents were found that recited Java as a claim limitation. 148 of these claim limitations were found to be in U. S. Patents assigned to Sun Microsystems. Applicants assert that the use of the word Java does not render a claim indefinite but provides clear and definite claim scope. Unlike other trademarks, Java does identify a product, namely a unique programming language.

Claims 1-4, 6-8, 11-18, 20-22, and 32-33 are rejected as being anticipated by Baisley U.S. Patent 6,292,932.

Claims 1-8 and 15-22 have been canceled.

Baisley teaches a system and method for converting from one modeling language to another. The example is UML (Unified Modeling Language) to MOF (Meta Object Facility). No teaching or suggestion was found for binding multiple type systems and handling type conversions as required by the amended claims.

Regarding claims 13 and 27, it is not seen how Baisley Figure 3 and the description cited at column 8 teaches multiple generators and a DO generator. Baisley appears to teach converting from one model to one other model and accordingly it is not seen how multiple generators are taught. Applicants on the other hand teach and claim conversion from a model to multiple type systems such as Java, XML, SQL etc. Baisley appears to be using only the XML to get MOF. Accordingly this rejection is respectfully traversed.

Claims 5, 9-10, 19, 23-24 and 31 are rejected as being obvious over Baisley in view of Goodwin U.S. Patent 6,199,195.

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No teaching or suggestion was found in Goodwin for binding multiple type systems and handling type conversions as required by the amended claims. Neither was any teaching or suggestion found in Goodwin or Baisley for providing sub-graphs to handle subsets of a model which has the advantage of yielding multiple views of the same model. Claims 10, 24 and 33 are so limited as currently amended.

Other art was cited but not applied. Of this art, Patents 5,596,746; 6,038,393; 6,330,569 and 6,560,769; like Baisley are creating a model and not generating multiple type systems as applicants claim. Accordingly they appear to be cumulative with Baisley. Patent 6,343,265 is directed toward mapping a design model to a repository. Patents 6,016,394 and 6,018,627 are directed toward application development. 6,018,627 includes legacy program integration. No teaching or suggestion was found for binding multiple type systems and handling type conversions or providing sub-graphs to handle subsets of a model.

The non-patent references cited but not applied are also believed to not suggest or teach applicants invention. Pasaje et al. reference U relates to creating a real time UML model using a case tool. Suzuki et al. reference V discusses interoperability and interchange of software design models using UML, XML, DOM and CORBA. Suzuki reference W relates to the same subject as reference V and extends the discussion by proposing a software management system called SoftDock.

It is believed that this application is now in condition for allowance and an early issue date will be appreciated. However in the event that the Examiner determines otherwise, applicants

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solicit an interview in order to resolve any issues that may be resolved before final.

Respectfully submitted,
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